

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

LATOYA HARRIS,

PLAINTIFF

V.

CIVIL ACTION NO. 3:20-cv-043-GHD-JMV

DEFENDANT

MEDICAL FINANCIAL SERVICES, INC.

DECLARATION OF LAJUANDA WILLIAMS-GRIFFIN

Pursuant to 28 U.S.C. § 1746, I, LaJuanda Williams-Griffin, hereby declare under the penalties for perjury under the laws of the United States of America that the following is true and correct:

1. I am an attorney licensed to practice law in Mississippi and I represent the Plaintiff Latoya Harris in the above caption matter.

2. I make this Declaration in support of Plaintiff's response to defendant Medical Financial Services, Inc.'s Motion to Dismiss based upon my personal knowledge and review of the file, emails, and pleadings filed in the above captioned matter.

3. I was hired as counsel for Plaintiff to replace Jacob Burns and filed an appearance in this case on December 7, 2020, replacing Jacob Burns as attorney for Plaintiff based upon his failures to represent Plaintiff in this matter.

4. Jacob Burns did not timely respond to emails, telephone calls, and did not take any action to remedy this error despite numerous emails and telephone calls.

5. I am familiar with the case and request this Court allow the parties time to resolve any discovery issues and proceed with a timely resolution of this case.

I AFFIRM UNDER THE PENALTIES FOR PERJURY THAT THE FOREGOING REPRESENTATIONS ARE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: December 16, 2020

/s/ LaJuanda Williams-Griffin
LaJuanda Williams-Griffin